

 ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	SEALED
UNITED STATES OF AMERICA	:	<u>SUPERSEDING</u>
	:	<u>INFORMATION</u>
- v. -	:	
	:	S4 14 Cr. 760 (KMK)
ANDREA BEATTY,	:	
	:	
Defendant.	:	
- - - - -	X	

COUNT ONE

The United States Attorney charges:

1. In or about August 2014, in the Southern District of New York and elsewhere, ANDREA BEATTY, the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b) (1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b) (3), to wit, BEATTY agreed with others to rob Ryan Ennis, a marijuana dealer.

(Title 18, United States Code, Section 1951.)

COUNT TWO

The United States Attorney further charges:

2. On or about August 26, 2014, in the Southern District of New York, ANDREA BEATTY, the defendant, unlawfully and

knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did aid and abet the same, and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, to wit, BEATTY robbed Ryan Ennis, a marijuana dealer, and aided and abetted the same.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE

The United States Attorney further charges:

3. On or about August 26, 2014, in the Southern District of New York and elsewhere, ANDREA BEATTY, the defendant, knowingly traveled in interstate and foreign commerce and used the mails and any facility in interstate and foreign commerce, with intent to commit a crime of violence, namely, robbery, assault, and murder, to further an unlawful activity, namely, a business enterprise involving one or more controlled substances, and with intent to promote, manage, establish, and carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity, and thereafter did perform a crime of violence to further the unlawful activity, and did aid and abet the same, and death resulted, to wit, BEATTY traveled from New Jersey to Ossining, New York, where BEATTY

aided and abetted the robbery, stabbing and murder of Ryan Ennis, resulting in Ennis's death.

(Title 18, United States Code, Sections 1952 and 2.)

COUNT FOUR

The United States Attorney further charges:

4. In or about the summer of 2014, in the Southern District of New York and elsewhere, ANDREA BEATTY, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that ANDREA BEATTY, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substances that ANDREA BEATTY, the defendant, conspired to distribute were: (1) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, and (2) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code,
Sections 846, 841(a)(1), 841(b)(1)(A).)

FORFEITURE ALLEGATION AS TO COUNTS ONE, TWO AND THREE

7. As a result of committing the offenses alleged in Counts One, Two and Three of this Superseding Information, ANDREA BEATTY, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property that constitutes or is derived from proceeds traceable to the commission of one or more of the offenses alleged in Counts One, Two, and Three of this Superseding Information.

FORFEITURE ALLEGATION AS TO COUNT FOUR

8. As a result of committing the controlled substance offense alleged in Count Four of this Superseding Information, ANDREA BEATTY, the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violation alleged in Count Four of this Superseding Information, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of one or more of the offenses.

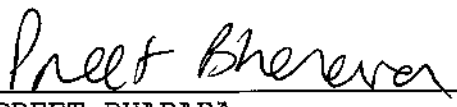
Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 981, Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 981, Title 21, United States Code, Sections 841(a)(1) and 853, and Title 28, United States Code, Section 2461.)


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ANDREA BEATTY,

Defendant.

SUPERSEDING INFORMATION

S4 14 Cr. 760 (KMK)

(18 U.S.C. §§ 1951, 1952 and 2, and 21
U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A))

PREET BHARARA
United States Attorney.
